

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 2:04cr_____
)	
v.)	21 U.S.C. §§ 846 and 841
)	Conspiracy to Possess with Intent to
WALLA VINCENT BALDWIN, JR)	Distribute and Distribute Cocaine
a/k/a "Neil Robert Jones")	(Count 1)
a/k/a "Boggie")	
a/k/a "Shawn")	21 U.S.C. § 853
)	Criminal Forfeiture

CRIMINAL INFORMATION

October 2004 - at Norfolk, Virginia

COUNT ONE

____THE UNITED STATES ATTORNEY CHARGES THAT:

From in or about early 2000, the exact date to the grand jury being unknown, up to and continuing until March 2001, in the Eastern District of Virginia and elsewhere, the defendant,

WALLA VINCENT BALDWIN, JR.
a/k/a "Neil Robert Jones"
a/k/a "Boggie"
a/k/a "Shawn"

did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together, with each other, and with other persons both known and unknown to the grand jury to commit the following offenses against the United States:

1. To knowingly, intentionally and unlawfully possess with the intent to distribute 5 kilograms or more of a mixture and substance containing a detectible amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and Title 18, United States Code, Section 2; and

2. To knowingly, intentionally and unlawfully distribute 5 kilogram or more of a mixture and substance containing a detectible amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and Title 18, United States Code, Section 2.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

1. In or about the early part of 2000, Grant Womack and WALLA VINCENT BALDWIN, JR. agreed to have BALDWIN supply Womack with kilogram quantities of powder cocaine from a source of supply in Texas. Thereafter through the spring and summer of 2000, Womack provided currency to BALDWIN in exchange for kilograms of cocaine on more than six occasions.

2. On or about June 5, 2000, WALLA VINCENT BALDWIN, JR. registered for one night at the Howard Johnson Hotel, 2755, I-35, Exit 159B, San Antonio, Texas and paid \$ 55.98 in cash.

3. In or about August, 2000, WALLA VINCENT BALDWIN, JR. through his girlfriend, hired a Rafeka Hamilton to transport kilogram quantities of cocaine from Texas to Virginia via commercial planes.

4. On or about September 11, 2000, a suitcase containing 5 kilograms of cocaine was recovered in Colorado Springs, Colorado tagged as belonging to Rafeka Hamilton who was booked on a flight from Dallas, Texas to Norfolk, Virginia.

5. On or about September 12, 2000 at the Norfolk International Airport, Rafeka Hamilton attempted to recover the bag containing the 5 kilogram of cocaine.

6. On or about late 2000, at Norfolk, Virginia, WALLA VINCENT BALDWIN, JR.'s girlfriend provided \$ 10,000.00 to Rafeka Hamilton's mother to pay for an attorney.

7. On or about February 12, 2001, at Norfolk, Virginia, Rafeka Hamilton told a girlfriend of WALLA VINCENT BALDWIN, JR. that she needed "three". The girlfriend stated to Rafeka Hamilton that in a recorded conversation that "he has paid you \$ 30,000.00 on her and he does not have anymore money."

8. On or about February 17, 2001, at Norfolk, Virginia, the defendant secured identification under the alias name Neil Robert Jones using the social security number of another person.

(All in violation of Title 21, United States Code, Section 846).

CRIMINAL FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

The defendant,

WALLA VINCENT BALDWIN, JR.
a/k/a "Neil Robert Jones"
a/k/a "Boggie"
a/k/a "Shawn"

if convicted of the violation alleged in Count One of this Information, as part of the sentencing of the defendant pursuant to F.R.Cr.P. 32.2, shall forfeit to the United States:

1. Any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such violations; and

2. Any of the defendants's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations;

The Specific property identified includes, but is not limited to:
A Monetary Judgement equal to the gross proceeds realized from the distribution of approximately 40-50 kilograms of cocaine which the United States calculates as a sum of no less than \$800,000.00.
Real Property held in DSG Investment, Inc., to which the defendant has an interest in.
Real Property held in MGB Investment Company to which the defendant has an interest in.
Personal Property of either corporation to which the defendant has an interest in.

3. Any other property of the defendants up to the value of the property subject to forfeiture above, if any property subject to forfeiture above, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third person, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in

value, or (e) has been commingled with other property that cannot be subdivided without difficulty.

(All in violation of Title 21, United States Code, Section 853)

PAUL J. MCNULTY
UNITED STATES ATTORNEY

By: _____
Kevin M. Comstock
Assistant United States Attorney